

THE OFFICE OF REGULATORY STAFF

REBUTTAL TESTIMONY

OF

NORMAN K. RICHARDSON, JR.

OCTOBER 24, 2018



DOCKET NOS. 2017-207-E;
2017-305-E AND 2017-370-E

Request of the Office of Regulatory Staff for Rate
Relief to South Carolina Electric & Gas Company's
Rates Pursuant to S.C. Code Ann. § 58-27-920

**REBUTTAL TESTIMONY OF
NORMAN K. RICHARDSON, JR.**

ON BEHALF OF

THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF

DOCKET NOS. 2017-207-E; 2017-305-E AND 2017-370-E

**IN RE: REQUEST OF THE OFFICE OF REGULATORY STAFF FOR RATE
RELIEF TO SOUTH CAROLINA ELECTRIC & GAS COMPANY'S RATES
PURSUANT TO S.C. CODE ANN. § 58-27-920**

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.

A. My name is Norman K. Richardson, Jr. My business address is 32 Dunaire Court, Mableton, Georgia 30126. I am President of Anchor Power Solutions, LLC.

Q. DID YOU PREVIOUSLY SUBMIT DIRECT TESTIMONY IN DOCKET NO. 2017-370-E?

A. Yes. I submitted direct testimony in Docket No. 2017-370-E which has been consolidated for hearing purposes with Docket No. 2017-305-E. My direct testimony and exhibits filed in Docket No. 2017-370-E addresses many of the issues raised by South Carolina Electric & Gas Company ("SCE&G" or "Company") witness Joseph Lynch.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY FILED IN DOCKET NO. 2017-370-E?

A. The purpose of my testimony is to present the results of an analysis comparing the costs, as of March 31, 2015, of either completing construction of the V.C. Summer Units 2 and 3 Project ("NND Project") 1) on a schedule with completion dates of June 2021 for Unit 2 and June 2022 for Unit 3, or 2) abandoning the NND Project and constructing two

combined cycle gas plants of the same size with the same online dates instead. I also address deficiencies in the economic analysis presented by SCE&G in Docket No. 2016-223-E and in Docket No. 2017-370-E.

Q. DO YOU HAVE ANY CHANGES TO YOUR DIRECT TESTIMONY PRE-FILED IN DOCKET NO. 2017-370-E AFTER REVIEW OF THE DIRECT TESTIMONY FILED BY SCE&G IN DOCKET NO. 2017-305-E?

A. No. After my review of the direct testimony filed by SCE&G witness Joseph Lynch, the conclusions remain unchanged as presented in my pre-filed direct testimony in Docket No. 2017-370-E and are also applicable in Docket No. 2017-305-E. I am hereby adopting by reference in Docket No. 2017-305-E the testimony and exhibits which I have previously pre-filed in Docket No. 2017-370-E.

Q. WILL YOU UPDATE YOUR TESTIMONY BASED ON INFORMATION THAT BECOMES AVAILABLE?

A. Yes. ORS fully reserves the right to revise its recommendation via supplemental testimony should new information become available to ORS not previously provided by the Company, or from pending state and federal investigations and lawsuits.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.